

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

NAOD TSEGAY

Case No.

22-MJ-980

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of see attached Affidavit in the county of Delaware in the
Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 1704

USPS keys or locks stolen or reproduced

18 U.S.C. § 1708

Theft or receipt of stolen mail matter

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet./s/ Christopher Weite*Complainant's signature*Christopher Weite, Postal Inspector, USPIS*Printed name and title*

Sworn to before me and signed in my presence.

Date: 6/21/2022/s/ Richard A. Lloret*Judge's signature*City and state: Philadelphia, PAHon. Richard A. Lloret, U.S. Magistrate Judge*Printed name and title*

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : Magistrate No. 22-980

v. :

NAOD TSEGAY : **[UNDER SEAL]**

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Christopher Weite, being duly sworn, state as follows:

INTRODUCTION

1. I am a United States Postal Inspector assigned to the Philadelphia Division of the U.S. Postal Inspection Service (USPIS) and have been so employed since February 2017. I am currently assigned to the Philadelphia External Crimes Team, which investigates violations of federal law, including theft and reproduction of USPS Arrow Keys, mail theft, identity fraud, aggravated identity theft, access device fraud, and mail fraud, wire fraud, and bank fraud, in violation of Title 18, United States Code, Sections 1704, 1708, 1028(a), 1028A, 1029, 1341, 1343 and 1344, respectively. I have received training in investigating identity theft, credit card fraud, counterfeit check fraud, counterfeit identification card fraud, and mail and wire fraud offenses. During my employment as an Inspector, I have participated in numerous investigations involving mail theft, identity fraud, aggravated identity theft, mail fraud, and wire fraud.

2. I make this Affidavit in support of a criminal complaint charging Naod TSEGAY, date of birth September 17, 1999, with keys or locks stolen or reproduced, in violation of Title 18, United States Code, Section 1704, and theft or receipt of stolen mail matter, in violation of Title 18, United States Code, Section 1708.

3. Specifically, as set forth below, I have probable cause to believe that TSEGAY

knowingly and unlawfully possessed Arrow Keys belonging to the United States Postal Service (USPS) which are designed to open USPS collection boxes, with the intent to unlawfully use those keys to steal mail from those collection boxes. I also have probable cause to believe that TSEGAY unlawfully possessed mail that had been stolen from USPS collection boxes, knowing the same to have been stolen.

4. The facts in this Affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This Affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and warrant and does not set forth all of my knowledge about this matter

FACTS SUPPORTING PROBABLE CAUSE

5. USPS utilizes a system of locks and keys to secure mail in blue collection boxes. Specifically, these blue collection boxes are opened with a key called an Arrow Key. Each USPS Arrow Key has a unique serial number and has letters imprinted on the key, denoting that the key is property of USPS. Individual Arrow Keys are accountable property and letter carriers sign individual Arrow Keys in and out at the beginning and end of their shifts. Only those employed by USPS are authorized to possess Arrow Keys at any time. A single USPS Arrow Key opens dozens of locks in a specific geographic area (typically, all of the collection boxes in a given zip code) and provides USPS letter carriers access to blue collection boxes located on their route.

6. USFIS and the Yeadon Borough Police Department have been investigating the theft of mail in and around Delaware and Philadelphia Counties in Pennsylvania since approximately January 2021. In or about January 2021, the Yeadon Borough Police Department

began receiving numerous complaints reporting bank and credit union checks stolen from USPS collection boxes located in Yeadon, Pennsylvania.

7. In the early morning hours of June 1, 2021, a gray Honda Accord bearing registration LSF7107 (the “vehicle”) was captured by surveillance cameras installed near the USPS collection box located at Church Lane and Whitby Avenue in Yeadon, Pennsylvania. An unknown subject was observed exiting the front passenger side of the vehicle and walking up to the USPS collection box. The subject opened the collection box, removed the USPS bin inside, and then dumped the contents of the bin into the front seat of the vehicle. The subject then placed the empty mail bin back in the collection box, returned to the vehicle, and the vehicle drove away.

8. The Yeadon Borough Police Department subsequently secured a search warrant for the vehicle, which was registered to R.F.¹

9. On or about June 15, 2021, Yeadon Borough police officers conducted a stop of the vehicle after observing the vehicle make a sudden righthand turn onto Wycombe Avenue from Baily Road in Yeadon, Pennsylvania without utilizing a proper turn signal. The occupants of the vehicle at the time of the stop were Naod TSEGAY, Z.W., R.F., and F.B.

10. During the subsequent search of the vehicle pursuant to the state search warrant referenced in paragraph 8, above, officers recovered, *inter alia*, the following items:

- a. Numerous checks, money orders, and debit cards;
- b. A Glock firearm (serial no. BPMV452) with 14 rounds of ammunition inside the magazine and one round in the chamber;

¹ The full names of “R.F.” and other potential co-conspirators are known to law enforcement but have been redacted here. The names of all victims are also known to law enforcement and also have been redacted here.

c. A keychain containing a USPS Arrow Key bearing serial number 63-1912 (corresponding to zip code 19131, in the West Park section of Philadelphia); and

d. Two bottles of HEET antifreeze² and two toothbrushes.

The debit cards and the vast majority of the bank checks and money orders recovered from the vehicle were not in the name of any of the occupants of the vehicle.³

11. Naod TSEGAY, the driver of the vehicle, was placed under arrest, and a search incident to arrest was conducted. Located inside TSEGAY's left sneaker, under the sole of the shoe, were approximately 19 debit cards not bearing his name or the names of any of the occupants of the vehicle. Located inside TSEGAY's right sneaker, under the sole of the shoe, were more than 50 bank checks not belonging to him or to any of the occupants of the vehicle. The face value of the checks recovered from TSEGAY's shoe totaled approximately \$15,000.

12. On or about June 16, 2021, the Yeadon Borough Police Department secured a search warrant for TSEGAY's residence, located at 90 Chester Pike, Apt. 1, Collingdale, Pennsylvania 19023.⁴

13. On June 17, 2021, the Yeadon Borough Police Department, along with USPIS personnel, executed the search warrant at 90 Chester Pike, Apt. 1, in Collingdale, Pennsylvania. During the search of TSEGAY's bedroom, a Honda key fob, with two USPS Arrow Keys on the

² In your Affiant's experience, this brand of antifreeze can be used to remove ink from checks, thereby allowing them to be altered.

³ Some of the money orders and one check were made payable to R.F., and one check was made payable to TSEGAY. However, the vast majority of the checks and money orders were made out to other individuals.

⁴ This address was listed on TSEGAY's Pennsylvania driver's license, issued on May 9, 2019. TSEGAY's license lists his city of residence as "Darby, Pennsylvania," as opposed to Collingdale, but the zip code and street address are the same.

key ring, was recovered from a shelf in the bedroom. The serial numbers of the two recovered Arrow Keys were 74-18383 (corresponding to zip code 19050 in Yeadon/Lansdowne) and 44-2896 (corresponding to zip codes 19122 and 19123 in the Spring Garden and Yorktown sections of Philadelphia). Also recovered were several bank checks not in TSEGAY's name and a clothes hamper filled with open and unopened mail. Among the pieces of mail in the clothes hamper were greeting cards not made out to TSEGAY and envelopes not addressed to him. The mail appeared to not yet have been processed by USPS given that the stamps on the envelopes had not been canceled.

14. Based on your Affiant's review of USPS records, the three Arrow Keys recovered from the vehicle and from TSEGAY's residence are property of USPS. The serial number on each of the keys was listed on historic key audits conducted at the Lansdowne Post Office (zip code 19050), the West Park Post Office (zip code 19131), and the Spring Garden Post Office (zip code 19122), respectively, indicating that each recovered Arrow Key had previously been part of the inventory of Arrow Keys at those Post Offices.

15. At the time the Arrow Keys were recovered, TSEGAY was not—nor had he ever been—employed by USPS. Therefore, TSEGAY lacked any lawful authority to possess the three recovered USPS Arrow Keys.

16. Between March and June 2022, your Affiant interviewed several of the accountholders whose bank checks were recovered from TSEGAY's person on June 15, 2021, as follows:

a. Victim #1, a resident of Lansdowne, Pennsylvania, confirmed that he/she placed four checks (check nos. 1101, 1102, 1103, and 1104) drawn on his/her Freedom Credit Union account in the USPS collection box located in front of the Lansdowne Post Office, 45 N.

Union Avenue, Lansdowne, PA 19050, on or about June 10, 2021. Those four checks were among the checks recovered from TSEGAY's person at the time of his arrest on or about June 15, 2021. According to Victim #1, he/she did not give anyone else permission to possess the checks other than the persons to whom the checks were made payable. None of the four recovered checks was made payable to TSEGAY.

b. Victim #2, a resident of Darby, Pennsylvania, confirmed that he/she placed two checks (check nos. 416 and 417) drawn on his/her American Heritage Federal Credit Union account in the USPS collection box located in front of the Lansdowne Post Office on or about June 12 or 13, 2021. Those two checks were among the checks recovered from TSEGAY's person at the time of his arrest on or about June 15, 2021. According to Victim #2, he/she did not give anyone else permission to possess the checks other than the persons to whom the checks were made payable. Neither of the two recovered checks was made payable to TSEGAY.

c. Victim #3, a resident of Philadelphia, Pennsylvania, confirmed that he/she placed three checks (check nos. 2755, 2756, and 2757) drawn on his/her PNC Bank account in the USPS collection box located in front of the Lansdowne Post Office on or about June 10, 2021. Those three checks were among the checks recovered from TSEGAY's person at the time of his arrest on or about June 15, 2021. According to Victim #3, he/she did not give anyone else permission to possess the checks other than the persons to whom the checks were made payable. None of the three recovered checks was made payable to TSEGAY.

d. Victim #4, a resident of Philadelphia, Pennsylvania, confirmed that he/she placed three checks (check nos. 268, 269, 270) drawn on his/her Police and Fire Federal Credit Union account in the USPS collection box located in front of the Lansdowne Post Office on or about June 13, 2021. Those three checks were among the checks recovered from TSEGAY's

person at the time of his arrest on or about June 15, 2021. According to Victim #4, he/she did not give anyone else permission to possess the checks other than the persons to whom the checks were made payable. None of the three recovered checks was made payable to TSEGAY.

e. Victim #5, a resident of Yeadon, Pennsylvania, confirmed that he/she placed one check (check no. 7315) drawn on his/her Citizens Bank account in the USPS collection box in front of the Yeadon Borough Police Department, located at the corner of Church Lane and Baily Road in Yeadon, Pennsylvania 19050, on or about May 25, 2021. That check was among the checks recovered from TSEGAY's person at the time of his arrest on or about June 15, 2021. According to Victim #5, he/she did not give anyone else permission to possess the check other than the person to whom the check was made payable. The recovered check was not made payable to TSEGAY.

f. Victim #6, a resident of Yeadon, Pennsylvania, confirmed that he/she placed two checks (check nos. 2634 and 2635) drawn on his/her PNC Bank account in the USPS collection box located at the intersection of Bell Avenue and MacDade Boulevard in Yeadon, Pennsylvania 19050 on or about June 14, 2021. Those two checks were among the checks recovered from TSEGAY's person at the time of his arrest on or about June 15, 2021. According to Victim #6, he/she did not give anyone else permission to possess the checks other than the persons to whom the checks were made payable. Neither of the two recovered checks was made payable to TSEGAY.

17. Based on the above, there is probable cause to believe that each of the above-referenced checks recovered from TSEGAY's person on June 15, 2021 was stolen from a USPS

collection box located in the 19050 zip code using Arrow Key no. 74-18383, which was recovered from TSEGAY's residence on June 17, 2021.

CONCLUSION

18. Based on the above information, your Affiant submits that there is probable cause to believe that Naod TSEGAY, date of birth September 17, 1999, knowingly and unlawfully possessed Arrow Keys belonging to USPS, with the intent to unlawfully use those keys to steal mail from those collection boxes, in violation of 18 U.S.C. § 1704. There is also probable cause to believe that TSEGAY unlawfully possessed mail that had been stolen from USPS collection boxes, knowing the same to have been stolen, in violation of 18 U.S.C. § 1708.

19. Therefore, I respectfully request that the attached arrest warrant be issued, authorizing the arrest of Naod TSEGAY, date of birth September 17, 1999.

Respectfully submitted,

/s/ Christopher Weite
Christopher Weite
U.S. Postal Inspector
U. S. Postal Inspection Service

Subscribed and sworn to before me

on this 21st day of June, 2022

/s/ Richard A. Lloret
HONORABLE RICHARD A. LLORET
UNITED STATES MAGISTRATE JUDGE